

EXHIBIT 5

FILED
KATHY MARTIN
COUNTY CLERK

2019 MAY 22 AM 9:52

WALLA WALLA COUNTY
WASHINGTON

By 

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF WALLA WALLA

LAURA J. WILLIAMSON,

Plaintiff,

v.

CHRISTOPHER WHITED, PATTERSON
DENTAL SUPPLY, INC.,

Defendants.

No. **19 2 00398 36**

SUMMONS FOR COMPLAINT FOR
PERSONAL INJURY

(20 day)

TO: Christopher Whited

A lawsuit has been started against you in the above-entitled court by Laura J. Williamson, plaintiff. Plaintiff's claims are stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this Complaint, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the undersigned attorney within twenty (20) days after the service of this Summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiff is entitled to what she asks for

SUMMONS FOR COMPLAINT - 1-

19-2-00398-36
SMCMP 1
Summons and Complaint
5652231



BRADLEY JOHNSON LAWYERS
1333 STEWART STREET
SEATTLE, WASHINGTON, 98109
Telephone: (206) 223-1601
Fax: (206) 223-1677

1 because you have not responded. If you serve a notice of appearance on the undersigned attorney,
2 you are entitled to notice before a default judgment may be entered.

3 You may demand that the plaintiff file this Complaint with the court. If you do so, the
4 demand must be in writing and must be served upon the undersigned attorney. Within 14 days
5 after you serve the demand, the plaintiff must file this lawsuit with the court, or the service on
6 you of this Summons and Complaint will be void.

7
8 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
9 that your written response, if any, may be served on time.

10
11 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
12 of Washington.

13 DATED this 20 day of May, 2019.

14
15 LAW OFFICES OF BRADLEY JOHNSON

16
17 

18
19 BRADLEY JOHNSON, WSBA #22898
20 1333 Stewart Street
21 Seattle, Washington 98109
22 Phone: (206) 223-1601
23 Fax: (206) 223-1677

24
25
26
27
28 SUMMONS FOR COMPLAINT - 2-

BRADLEY JOHNSON LAWYERS
1333 STEWART STREET
SEATTLE, WASHINGTON, 98109
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KATHY MARTIN
COUNTY CLERK

2019 MAY 22 AM 9:52

WALLA WALLA COUNTY
WASHINGTON

By 11

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF WALLA WALLA

LAURA J. WILLIAMSON,

Plaintiff,

vs.

CHRISTOPHER WHITED, PATTERSON
DENTAL SUPPLY, INC.,

Defendants.

CASE NO. 19 2 00398 36

COMPLAINT FOR DAMAGES

Comes now, Laura Williamson, and alleges as follows:

General Allegations

1. Laura Williamson is a resident of Walla Walla County, Washington.
2. Plaintiff is informed and believes that defendant Christopher Whited, is a resident of the County of Nez Perce, State of Idaho.
3. Plaintiff is informed and believes that defendant Patterson Companies Inc. is a Minnesota corporation, authorized to do business and is doing business in the State of Washington, and does business as Patterson Dental Supply in Spokane Valley, Washington, located at 10020 E. Knox Ave., #300.

1 4. Plaintiff is further informed and believes that Patterson Dental Supply, Inc. "owns
2 and controls" the 2016 Ford Transit van, VIN# 1FTYR2xM5GKA09031.

3 5. Venue is proper in this Court and county pursuant to RCW 4.12.020(3) because
4 this matter seeks damages for personal injury, and the acts complained of occurred and/or arose
5 in Walla Walla County.

6 6. On May 31, 2016, at approximately 3:55 p.m., Laura Williamson was walking as
7 a pedestrian in the parking lot of the Cenex gas station, located at 706 West Rose Street, Walla
8 Walla, Washington. At approximately the same time, Defendant Christopher D. Whited was
9 driving the 2016 Ford Transit van through the Cenex gas station parking lot. He was inattentive
10 and struck the plaintiff with the Transit van.
11

12 **First Cause of Action**
13 **(Negligence against Defendants)**

14 7. Plaintiff repeats and incorporates herein by reference the allegations of
15 paragraphs 1 through 6, as though set forth below at length.

16 8. The above described motor vehicle incident was directly and proximately caused
17 by the negligence, negligent entrustment, or gross negligence, and the willful and wanton or
18 reckless conduct of the above named defendants, and each of them, jointly and severally, whose
19 actions were in violation of, though not limited to, the following statutes and rules of the road:
20 RCW 46.61.455 (use of due care and caution); RCW 46.51.525 (unlawful use of a motor vehicle
21 in a negligent manner).
22

23 9. Because of her injuries, plaintiff was, and has been required to seek medical
24 treatment for her injuries, which resulted in medical expenses and costs.
25
26

1 10. As a direct and proximate result of defendant's negligence, plaintiff has been
2 damaged in a sum within the jurisdiction of this court and in an amount according to proof,
3 including but not limited to general and special damages, medical expenses, loss of enjoyment of
4 life, loss of consortium, and pain and suffering, and such other ordinary and reasonable expenses
5 flowing from the actions of the defendants. Plaintiff will seek leave of court to amend this
6 Complaint to allege the exact amount of said damages when said sum is fully ascertained.

7 11. Plaintiff hereby waives the physician-patient privilege only to the extent required
8 by RCW 5.60.060, as limited by plaintiff's constitutional rights of privacy, contractual rights of
9 privacy, and the ethical and legal obligations not to engage in ex-parte contact between a treating
10 and/or expert physician and the patient's legal adversaries. This waiver does not include a
11 waiver of the rules of discovery under the Civil Rules of Procedure.

12 12. If defendants shall allege there is a party or non-party at fault (CR 12(I)), and
13 defendants are successful in sustaining their burden of proof against said potential other non-
14 parties, and the trier of fact finds that any non-party or party as may be hereafter brought into this
15 action is at fault, then plaintiff shall also be entitled to a judgment against said other parties or
16 non-parties against whom defendants have prevailed (CR 8).

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

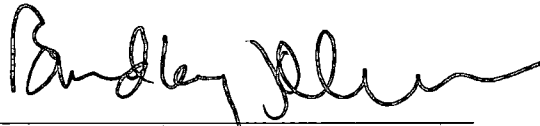
WHEREFORE, Plaintiff prays as follows:

1. For an award of damages compensating plaintiff to be proven at trial;
2. For an award of damages compensating plaintiff for her costs of suit incurred herein;
3. For an award of fees under RCW 4.84 or as otherwise permitted by law; and,
4. For such other and further relief as the court deems just and proper.

Dated: May 20, 2019

BRADLEY JOHNSON LAWYERS

For:



BRADLEY JOHNSON, WSBA #22898

1333 Stewart Street

Seattle, Washington 98109

Phone: (206) 223-1601

Fax: (206) 223-1677

FILED
KATHY MARTIN
COUNTY CLERK

2019 MAY 23 AM 9:02

WALLA WALLA COUNTY
WASHINGTON

By

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF WALLA WALLA

LAURA J. WILLIAMSON,

Plaintiff,

v.

CHRISTOPHER WHITED, PATTERSON
DENTAL SUPPLY, INC., PATTERSON
COMPANIES, INC.,

Defendants.

No. 19-Q-00398-36
Amended
SUMMONS FOR COMPLAINT FOR
PERSONAL INJURY

(20 day)

TO: DEFENDANTS ABOVE NAMED:

A lawsuit has been started against you in the above-entitled court by Laura J. Williamson, plaintiff. Plaintiff's claims are stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this Complaint, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the undersigned attorney within twenty (20) days after the service of this Summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiff is entitled to what she asks for

SUMMONS FOR COMPLAINT - 1-

19-2-00398-36
AMSM 2
Amended Summons
5663298



BRADLEY JOHNSON LAWYERS
1333 STEWART STREET
SEATTLE, WASHINGTON, 98109
Telephone: (206) 223-1601
Fax: (206) 223-1677

1 because you have not responded. If you serve a notice of appearance on the undersigned attorney,
2 you are entitled to notice before a default judgment may be entered.

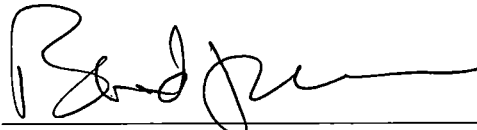
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4 demand must be in writing and must be served upon the undersigned attorney. Within 14 days
5 after you serve the demand, the plaintiff must file this lawsuit with the court, or the service on
6 you of this Summons and Complaint will be void.

7
8 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
9 that your written response, if any, may be served on time.

10
11 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
12 of Washington.

13 DATED this 20 day of May, 2019.

14
15 LAW OFFICES OF BRADLEY JOHNSON

16
17 

18 BRADLEY JOHNSON, WSBA #22898
19 1333 Stewart Street
20 Seattle, Washington 98109
21 Phone: (206) 223-1601
22 Fax: (206) 223-1677

FILED
KATHY MARTIN
COUNTY CLERK

2019 JUN -7 AM 9:03

WALLA WALLA COUNTY
WASHINGTON

By

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF WALLA WALLA, STATE OF
WASHINGTON

LAURA J. WILLIAMSON

Plaintiff/Petitioner

Cause No.: **19-2-00398-36**

Hearing Date:

vs.

CHRISTOPHER WHITED; ET AL.

Defendant/Respondent

DECLARATION OF SERVICE OF
SUMMONS FOR COMPLAINT FOR PERSONAL INJURY;
COMPLAINT FOR DAMAGES

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

On the **4th day of June, 2019 at 12:20 PM** at the address of **711 CAPITOL WAY S STE 204, OLYMPIA, Thurston County, WA 98501**; this declarant served the above described documents upon **PATTERSON DENTAL SUPPLY, INC. c/o C T CORPORATION SYSTEM, REGISTERED AGENT** by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with **Jeff Miner , REPRESENTATIVE, PERSON AUTHORIZED TO ACCEPT, who accepted service, with identity confirmed by subject saying yes when named, a brown-haired white male approx. 35-45 years of age, 5'10"-6'0" tall and weighing 160-180 lbs..**

No information was provided or discovered that indicates that the subjects served are members of the United States military.

Service Fee Total: **\$79.50**

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED 06/04/2019

Holly Hart

Holly Hart, Reg. # 16-0509-05, Thurston County

ORIGINAL PROOF OF SERVICE

PAGE 1 OF 1



For: Johnson, Bradley C.

Ref #: Williamson v. Whited, et al. (Patterson)

19-2-00398-36

AFSR

3

Affidavit Declaration Certificate Confirmation of
5779739



FILED
KATHY MARTIN
COUNTY CLERK

2019 JUN 10 AM 9:17

WALLA WALLA COUNTY
WASHINGTON

By _____

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF WALLA WALLA, STATE OF
WASHINGTON

LAURA J. WILLIAMSON

Plaintiff/Petitioner

Cause No.: 19-2-00398-36

Hearing Date:

vs.

CHRISTOPHER WHITED; ET AL.

Defendant/Respondent

DECLARATION OF SERVICE OF
SUMMONS FOR COMPLAINT FOR PERSONAL INJURY;
COMPLAINT FOR DAMAGES

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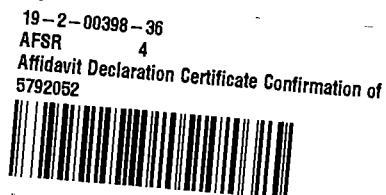
Service Fee Total: \$79.50

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED 06/04/2019

4
Holly Hart

Holly Hart, Reg. # 16-0509-05, Thurston County



ORIGINAL PROOF OF SERVICE

PAGE 1 OF 1

Tracking #: 0038063814



For: Johnson, Bradley C.

Ref #: Williamson v. Whited, et al. (Patterson)

FILED
KATHY MARTIN
COUNTY CLERK

2019 JUN 20 AM 9:09

WALLA WALLA COUNTY
WASHINGTON

[Signature]

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR WALLA WALLA COUNTY

LAURA J. WILLIAMSON,

Plaintiff,

vs.

CHRISTOPHER WHITED, PATTERSON
DENTAL SUPPLY, INC.,

Defendants.

No. 19-2-00398-36

**NOTICE OF APPEARANCE ON
BEHALF OF DEFENDANTS
CHRISTOPHER WHITED AND
PATTERSON DENTAL SUPPLY, INC.**

19-2-00398-36
NTAPR 5
Notice of Appearance
5891487



TO: Clerk of the Court;

AND TO: Plaintiff and her attorneys of record.

Defendants CHRISTOPHER WHITED and PATTERSON DENTAL SUPPLY, INC., without waiving any objection as to improper jurisdiction, venue or service of process, statute of limitations, or any other defense, hereby enter their appearance in the above-entitled action through their attorneys, Laura E. Kruse and the law firm of Forsberg & Umlauf, P.S., and request that all further pleadings and papers, except original process, be served upon said attorneys at the address below.

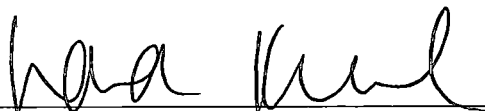
NOTICE OF APPEARANCE ON BEHALF OF DEFENDANTS CHRISTOPHER
WHITED AND PATTERSON DENTAL SUPPLY, INC. – PAGE 1

2394790 / 3638.0001

FORSBERG & UMLAUF, P.S.
ATTORNEYS AT LAW
901 FIFTH AVENUE • SUITE 1400
SEATTLE, WASHINGTON 98164-1039
(206) 689-8500 • (206) 689-8501 FAX

1 DATED this 17th day of June, 2019.

2 FORSBERG & UMLAUF, P.S.

3 

4 Laura E. Kruse, WSBA # 32947

5 901 Fifth Avenue, Suite 1400

6 Seattle, WA 98164

7 Telephone: 206-689-8500

8 Email: lkruse@foum.law

9 *Attorneys for Defendants Christopher Whited and*
10 *Patterson Dental Supply, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing **NOTICE OF APPEARANCE ON BEHALF OF DEFENDANTS CHRISTOPHER WHITED AND PATTERSON DENTAL SUPPLY, INC.** on the following individuals in the manner indicated:

Bradley Johnson
Bradley Johnson Attorneys
1333 Stewart Street
Seattle, WA 998109
(X) Via U.S. Mail
(X) Via Email
() Via Hand Delivery
() Via ECF

SIGNED this 17th day of June, 2019, at Seattle, Washington.


Jodie A. Branaman

FILED
KATHY MARTIN
COUNTY CLERK

2019 JUN 25 AM 9:33

WALLA WALLA COUNTY
WASHINGTON

IN THE SUPERIOR COURT, IN AND FOR THE COUNTY OF WALLA WALLA, STATE OF
WASHINGTON

LAURA J. WILLIAMSON

Plaintiff/Petitioner

Cause No.: **19-2-00398-36**

Hearing Date:

vs.

CHRISTOPHER WHITED; ET AL.

Defendant/Respondent

DECLARATION OF SERVICE OF
Summons; Complaint

The undersigned hereby declares: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, and is competent to be a witness therein.

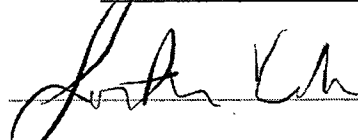
On the **19th day of June, 2019** at **3:38 PM** at the address of **10020 E KNOX AVE, SPOKANE VALLEY, Spokane County, WA 99206**; this declarant served the above described documents upon **PATTERSON DENTAL SUPPLY, INC.** by then and there personally delivering **1** true and correct copy(ies) thereof, by then presenting to and leaving the same with **Steve Davis, PERSON AUTHORIZED, PERSON AUTHORIZED TO ACCEPT**, who accepted service, with identity confirmed by subject stating their name, a white male approx. 55-65 years of age, 5'8"-5'10" tall, weighing 140-160 lbs with gray hair with a beard and glasses..

No information was provided or discovered that indicates that the subjects served are members of the United States military.

Service Fee Total: **\$109.50**

Declarant hereby states under penalty of perjury under the laws of the State of Washington that the statement above is true and correct.

DATED 6/21/19



Jonathon Kellers, Reg. # 1640, Spokane

ORIGINAL PROOF OF SERVICE

PAGE 1 OF 1

Track



For: Johnson, Bradley C.

Ref #: Williamson v. Whited, et al. (Patterson)

19-2-00398-36

AFSR

6

Affidavit Declaration Certificate Confirmation of
5922360

